

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS  
CORPORATION, et al.,

Reorganized Debtors.

Chapter 11

Case No. 20-22476 (MG)

(Jointly Administered)

**STIPULATED REQUEST TO EXTEND PRETRIAL DEADLINES**

WHEREAS, on September 11, 2024, the Movie Company Claimants (“MCCs”)<sup>1</sup>, the Record Company Claimants (“RCCs”)<sup>2</sup> (the MCCs and RCCs, collectively, “Claimants”), and Reorganized Debtors (together, “Frontier”) (Claimants and Frontier each a “Party” and, collectively, “Parties”) jointly proposed trial dates of March 10-28, 2025, and a schedule for pretrial deadlines based on those trial dates;

WHEREAS, on September 23, 2024, the Court issued an order adopting the Parties’ proposed schedule of pretrial deadlines while further ordering that “[t]he date for trial included in

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<sup>1</sup> Voltage Holdings, LLC; Backmask, LLC; Union Patriot Capital Management, LLC; Venice PI, LLC; Bedeviled, LLC; MON, LLC; Colossal Movie Productions, LLC; TBV Productions, LLC; Definition Delaware LLC; I Am Wrath Productions, Inc.; Hannibal Classics Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC; Rise Up, LLC; Status Update LLC; Morgan Creek Productions, Inc.; Shock and Awe, LLC; Fun Mom Dinner, LLC; Dead Trigger Movie, LLC; YAR Productions, Inc.; Gunfighter Productions, LLC; Ace in the Hole Productions, LP; SF Film, LLC; The Rest of Us, Inc.; Killing Link Distribution, LLC; Dallas Buyers Club, LLC; Rambo V Productions, Inc.; Millennium Funding, Inc.; Millennium IP, Inc.; LHF Productions, Inc.; UN4 Productions, Inc.; Millennium Media, Inc.; Bodyguard Productions, Inc.; Hunter Killer Productions, Inc.; Fallen Productions, Inc.; HB Productions, Inc.; Black Butterfly Film, LLC; AMBI Distribution Corp.; Dubious Productions, Inc.; Rupture CAL, Inc.; Future World One, LLC; Groove Tails Productions, LLC; Eve Nevada, LLC; After II Movie, LLC; and Wonder One, LLC.

<sup>2</sup> UMG Recordings, Inc. and Capitol Records, LLC (“Universal Claimants”); ABKCO Music & Records, Inc. (“ABKCO Claimants”); Sony Music Entertainment, Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment US Latin, Volcano Entertainment III, L.L.C., and Zomba Recording LLC (“Sony Claimants”); and Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Fueled by Ramen LLC, Maverick Recording Company, Nonesuch Records Inc., Rhino Entertainment Company, Rhino Entertainment LLC, Roadrunner Records, Inc., Warner Music Inc., Warner Music International Services Limited, Warner Music Nashville LLC, and Warner Records Inc. (“Warner Claimants”).

the schedule remains subject to further order of the Court. The schedule may only be amended or modified by further Order of this Court.” Scheduling Order re Future Proceedings (Sept. 23, 2024), ECF No. 2431 & ECF No. 2431-1;

WHEREAS, on December 18, 2024, the Court informed the Parties that it is unlikely the Court will be able to hold in-person proceedings before April 2025, *see* Statement Of Chief Judge Martin Glenn (Dec. 19, 2024), ECF No. 2480, and trial in in this matter therefore will not occur before May 1, 2025, *see* Dec. 18, 2024 Hr’g Tr. 11:20-12:21; 21:14-22;

WHEREAS, as per the Court’s directive, the Parties are continuing to confer with the aim of jointly proposing a mutually agreeable trial date;

WHEREAS, the Parties seek to extend certain of the existing pretrial deadlines by 30 days to account for the adjournment of the trial date and allow for additional time between the Final Pretrial Conference and trial;

THEREFORE, the Parties jointly stipulate and request the Court enter an order as follows:

All pretrial deadlines previously ordered by the Court in ECF No. 2431-1 are extended by 30 days (or to the extent any such new deadline falls on a Saturday, Sunday, or legal holiday, such deadline is further extended until the next day that is not a Saturday, Sunday, or legal holiday). *See* Exhibit A.

Dated: December 31, 2024

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**EXHIBIT A**

<b>DATE</b>	<b>DEADLINE</b>	<b>ELEMENTS</b>
2.10.2025	<b>Exchange Deposition Designations</b>	<ul style="list-style-type: none"> <li>• Serve deposition designations</li> </ul>
2.28.2025	<b>Exchange All Witness Statements</b>	<ul style="list-style-type: none"> <li>• Serve statements from fact witnesses</li> </ul>
3.3.2025	<b>Deposition Objections and Counter-designations</b>	<ul style="list-style-type: none"> <li>• Serve objections to deposition designations</li> <li>• Serve deposition counter-designations</li> </ul>
3.7.2025	<b>Deadline to file Motions in Limine</b>	<ul style="list-style-type: none"> <li>• File all motions in limine</li> </ul>
3.12.2025	<b>Deadline to Exchange Pre-Marked Exhibits</b>	<ul style="list-style-type: none"> <li>• Serve pre-marked exhibits</li> </ul>
3.14.2025	<b>Objections to Direct Testimony</b>	<ul style="list-style-type: none"> <li>• Serve all written objections to direct testimony</li> </ul>
3.14.2025	<b>Identify Witnesses to be Called for Cross-Examination</b>	
3.17.2025	<b>Objections to Deposition Counter-Designations</b>	<ul style="list-style-type: none"> <li>• Serve objections to deposition counter-designations</li> </ul>
3.19.2025	<b>Deadline to Exchange Supplemental Pre-Marked Exhibits</b>	<ul style="list-style-type: none"> <li>• Serve any additional pre-marked exhibits to be added to exhibit list.</li> </ul>
3.21.2025	<b>Deadline to File Responses to Motions in Limine</b>	<ul style="list-style-type: none"> <li>• File responses to motions in limine</li> </ul>
3.26.2025	<b>Objections to Exhibits</b>	<ul style="list-style-type: none"> <li>• Serve objections to exhibits</li> </ul>
3.28.2025	<b>Deadline to file Replies in Support of Motions in Limine</b>	<ul style="list-style-type: none"> <li>• File replies to responses to motions in limine</li> </ul>
3.31.2025	<b>Deadline to Submit Pretrial Briefs</b>	<ul style="list-style-type: none"> <li>• File pretrial briefs</li> </ul>
3.31.2025	<b>Deadline to Submit Joint Pretrial Order</b>	<ul style="list-style-type: none"> <li>• Elements from Template: <ul style="list-style-type: none"> <li>○ Statement of Nature of Case</li> <li>○ Basis for Jurisdiction</li> <li>○ Stipulated Facts</li> <li>○ Parties' Contentions</li> <li>○ Issues to be Tried</li> <li>○ Plaintiffs' Exhibits</li> <li>○ Defendants' Exhibits</li> <li>○ Stipulations and Objections re Exhibits</li> <li>○ Plaintiffs' Witness Lists</li> <li>○ Defendant's Witness List</li> <li>○ Relief Sought</li> </ul> </li> <li>• File deposition designations – submit transcripts with color-coded highlighting for each party's designations and counter-designations (2 copies each)</li> <li>• File deposition counter-designations – submit transcripts with color-coded highlighting for each party's designations and counter-designations (2 copies each)</li> <li>• File objections to deposition designations</li> <li>• File pre-marked exhibits (2 sets)</li> <li>• File written direct examinations of fact witnesses with objections</li> </ul>